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14
15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17
18 This Document Relates to:

19 DIRECT PURCHASER ACTIONS

20 *CompuCom Systems, Inc. v. Hitachi, Ltd., et
al.*, Individual Case No. 11-cv-06396

21 *Costco Wholesale Corporation v. Hitachi,
Ltd., et al.*, Individual Case No. 11-cv-06397

22 *Sears, Roebuck and Co. and Kmart Corp v.
Chunghwa Picture Tubes, Ltd., et al.,*
Individual Case No. 11-cv-05514

23 *Office Depot Inc. v. Hitachi Ltd., et al.,*
Individual Case No. 11-cv-06276

24 *Target Corp. v. Chunghwa Picture Tubes,
Ltd., et. al.*, Individual Case No. 11-cv-05514

25 *Best Buy Co., et al. v. Hitachi, LTD, et al.,*
Individual Case No. 11-cv-05513

Case No. Master File No. 3:07-cv-05944-SC

MDL NO. 1917

**DECLARATION OF HOJOON HWANG
IN SUPPORT OF DEFENDANTS' JOINT
MOTIONS FOR PARTIAL SUMMARY
JUDGMENT ON FTAIA GROUNDS AND
STANDING GROUNDS –
Sealed Exhibits 1-9**

[Notices of Joint Motions and Motions for Partial
Summary Judgment and Memoranda of Points
and Authorities and [Proposed] Order filed
concurrently]

Judge: The Honorable Samuel Conti

Date: February 6, 2015

Time: 10:00 A.M.

Crtrm.: 1, 17th Floor

1 *Circuit City, et al. v. Hitachi, LTD., et al.*,
2 Individual Case No. 11-cv-05502

3 *Costco Wholesale Corporation v. Hitachi,
4 Ltd., et al.*, Individual Case No. 11-cv-06397

5 *Electrograph Systems, Inc., et al. v. Hitachi,
6 LTD., et al.*, Individual Case No. 11-cv-01656

7 *Interbond Corporation of America d/b/a
BrandsMart USA v. Hitachi, Ltd., et al.*,
8 Individual Case No. 11-cv-06275

9 *Office Depot Inc. v. Hitachi Ltd., et al.*,
10 Individual Case No. 11-cv-06276

11 *P.C. Richard & Son Long Island Corporation
et al. v. Hitachi Ltd., et al.*, Individual Case
12 No. 12-cv-02648

13 *Schultze Agency Services, LLC on behalf of
Tweeter OPCO, LLC, et al., v. Technicolor SA,
et al.*, Individual Case No. 13-cv-05668

14 *Tech Data Corp., et al. v. Hitachi, LTD., et al.*,
15 Individual Case No. 13-cv-00151

16 *ViewSonic Corp. v. Chunghwa Picture Tubes,
Ltd.*, Individual Case No. 14-02510

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DECL. OF HOJOON HWANG ISO DEFS.' MOT.
FOR SUMM. J. ON FTAIA AND STANDING
GROUNDS

Master File No. 3:07-cv-05944-SC; mdl No. 1917

1 I Hojoon Hwang hereby declare:

2 I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of record for
3 Defendants LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG Electronics Taiwan Taipei
4 Co., Ltd. (collectively, "LGE") in the above entitled action. I am licensed in the State of
5 California and admitted to practice before this Court. I make this declaration based on my
6 personal knowledge and, if called upon as a witness, could and would testify competently as to the
7 matters set forth below.

8 1. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the
9 deposition of Mohan Roa, Ph.D. deposed in this case on June 10, 2014.

10 2. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the
11 rebuttal expert report of Mohan Roa, Ph. D. to Jansuz Ordover dated September 26, 2014.

12 3. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the
13 rebuttal expert report of James McClave, Ph. D. dated September 26, 2014.

14 4. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the expert
15 report of James McClave dated April 15, 2014.

16 5. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the expert
17 report of Alan Frankel, Ph.D. (Best Buy) dated April 15, 2014.

18 6. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the
19 deposition of Alan Frankel, Ph.D. deposed in this case on July 10, 2014.

20 7. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the expert
21 report of Mohan Rao, Ph.D. dated April 15, 2014.

22 8. Attached hereto as Exhibit 8 is a true and correct copy of deposition exhibit 3451
23 marked at the deposition of Mohan Roa, Ph.D., deposed in this case on June 10, 2014.

24 9. Attached hereto as Exhibit 9 is true and correct copy of excerpts from the
25 supplemental expert report of Alan Frankel, Ph.D. dated June 30, 2014.

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1 I declare under penalty of perjury under the laws of California that the foregoing is true
2 and correct. Executed on the 7th day of November, 2014 in San Francisco, California.
3

4 DATED: November 7, 2014

MUNGER, TOLLES & OLSON LLP

7 */s/ Hojoon Hwang*
8 HOJOON HWANG

9 Attorneys for Defendants LG ELECTRONICS,
10 INC., LG ELECTRONICS U.S.A., INC., and LG
ELECTRONICS TAIWAN TAIPEI CO., LTD.

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